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10 *Attorneys for Plaintiff*  
11 THAT ONE VIDEO ENTERTAINMENT, LLC, a  
12 California limited liability company

13 **UNITED STATES DISTRICT COURT**

14 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

15 THAT ONE VIDEO  
16 ENTERTAINMENT, LLC, a  
17 California limited liability company,

18 Plaintiff,

19 vs.

20 KOIL CONTENT CREATION PTY  
21 LTD., an Australian proprietary  
22 limited company doing business as  
23 NOPIXEL; MITCHELLE CLOUT,  
24 an individual; and DOES 1-25,  
25 inclusive,

26 Defendants.

27 CASE NO: 2:23-cv-02687 SVW (JCx)

28 [Assigned to the Hon. Stephen V. Wilson;  
Ctrm 10A]

**STIPULATION TO CONTINUE TRIAL  
AND ALL RELATED DEADLINES**

Action Filed: April 10, 2023  
Trial Date: July 16, 2024

**STIPULATION TO CONTINUE TRIAL AND TRIAL DEADLINES**

COMES NOW Plaintiff THAT ONE VIDEO ENTERTAINMENT, LLC, a California limited liability company (“TOVE” or “Plaintiff”) and Defendants KOIL CONTENT CREATION PTY LTD., an Australian proprietary limited company doing business as NOPIXEL (“NoPixel”), and MITCHELL CLOUT, an individual (“Clout”) (collectively, “Defendants”) hereby state as follows:

1. WHEREAS, on July 7, 2023, Plaintiffs filed their operative First Amended Complaint for Declaratory Relief, Breach of Contract, and an Accounting (Dkt. No. 18);

2. WHEREAS, on February 14, 2024, the Court denied Defendants' Motion to Dismiss the First Amended Complaint (Dkt. No. 26);

3. WHEREAS, on or about March 18 and 19, 2024, the parties exchanged their Initial Disclosures pursuant to Rule 26;

4. WHEREAS, on March 26, 2024, a New Case Status Conference was held, and the Court set a Trial for July 16, 2024 (Dkt. No. 29);

5. WHEREAS, on March 29, 2024, Defendants served written discovery on Plaintiff;

6. WHEREAS, on April 8, 2024, Plaintiff served written discovery on Defendants;

7. WHEREAS, Plaintiff has obtained an expert, to which Defendants have not yet agreed, but are considering;

8. WHEREAS, on April 15, 2024, the parties met and conferred on how the source code will be reviewed, which Defendants are also considering;

9. WHEREAS, on April 15, 2024, the parties filed a Protective Order, which will control the expert's review of the relevant source code (Dkt. No. 33);

10. WHEREAS, Plaintiff's expert will need at least forty-five (45) days from the date Defendants have agreed to accept his designation, to review the source code and draft a report;

1       11. WHEREAS, pursuant to Federal Rule of Civil Procedure (“FRCP”)  
2 26(a)(2)(B)(i), Plaintiff’s deadline to designate its expert and provide a final version  
3 of the expert’s report is today, April 17, 2024;

4       12. WHEREAS, the parties – having worked diligently to advance this case  
5 as best as possible – have therefore agreed to continue the trial and all related  
6 deadlines by at least ninety (90) days; and

7       13. WHEREAS, this is the parties’ first joint request for a continuance.

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9       DATED: April 17, 2024

**ALTVIEW LAW GROUP, LLP**

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By: 

JOHN M. BEGAKIS

*Attorneys for Plaintiff THAT ONE VIDEO  
ENTERTAINMENT, LLC, a California  
limited liability company*

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DATED: April 17, 2024

**MORRISON COOPER**

By: /s/ Larry Zerner

LARRY ZERNER

*Attorneys for Defendants KOIL CONTENT  
CREATION PTY LTD. and MITCHELL  
CLOUD*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing electronically filed document has been served via a "Notice of Electronic Filing" automatically generated by the CM/ECF System and sent by e-mail to all attorneys in the case who are registered as CM/ECF users and have consented to electronic service pursuant to L.R. 5-3.3.

Dated: April 17, 2024

By: /s/ John Begakis  
John M. Begakis